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SCOTT ROHLEDER

UNITED STATES DISTRICT COURT
FOR THE CENTRAL DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA

Plaintiff,

v.

PAUL A. BILZERIAN, et. al,
(2) SCOTT ROHLEDER
(3) IGNITE INTERNATIONAL
BRANDS, LTD.

Defendants.

Case No. 2:24-CR-00569-MEMF

Hon. Maame Ewusi-Mensah Frimpong

**RENEWED STIPULATION TO
CONTINUE HEARING DATE ON
DEFENDANTS' MOTION TO
DISMISS COUNTS ONE
THROUGH SIX OF THE
INDICTMENT**

Current Hearing Date: June 5, 2025
Requested Hearing Date: July 31, 2025
Trial date: November 3, 2025

1 Defendants Ignite International Brands, Ltd. (“Ignite”), by and through their
2 counsel of record, Nina Marino, Moriah Radin and Jennifer Lieser, and Scott
3 Rohleder (“Rohleder”), by and through their counsel of record, David Schoen and
4 Simon Schoen, and Plaintiff United States of America, by and through its counsel
5 of record, Assistant United States Attorneys Alexander B. Schwab, Jason C. Pang,
6 and Mikaela W. Gilbert-Lurie, hereby agree and stipulate as follows:

7 1. As set forth in the parties’ Stipulation to Continue the Hearing on
8 Defendants’ Motion to Dismiss (the “Stipulation”) filed on May 29, 2025, the
9 parties wish to continue the hearing on Defendants’ Motion to Dismiss Counts One
10 Through Six of the Indictment (the “Motion to Dismiss”), Dkt No. 78, from June 5
11 to July 31, 2025. (Dkt No. 114.)

12 2. On May 30, 2025, this Court denied the parties’ Stipulation because no good
13 cause was shown for the continuance. (Dkt No. 115.)

14 3. The parties file this Renewed Stipulation to Continue the Hearing Date on
15 Defendants’ Motion to Dismiss to provide the Court with additional factual
16 background to support good cause for the requested continuance of the hearing
17 date.

18 4. The pending Motion to Dismiss was drafted by prior defense counsel and
19 filed on March 11, 2025. (Dkt No. 78.) Current defense counsel was substituted
20 into the case in mid-April 2025. (Dkt Nos. 107, 110).

21 5. The government’s discovery in this case consists of approximately 5
22 terabytes of data. Despite diligent action by both counsel for the government and
23 defense counsel, defense counsel received the discovery in this matter on or about
24 May 20, 2025. The discovery has been shipped to defense counsel’s hosting
25 vendor and is being processed. Given the volume and several technical difficulties,
26 counsel do not yet have access to the discovery and therefore, have not yet
27 reviewed it.
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1 6. As the Court is aware, counts two through six in the indictment relate to
2 transactions and communications involving Ignite and “Company 1” that occurred
3 from October 2020 through April 2021. (Dkt No. 1, ¶¶ 5-10.) The Motion to
4 Dismiss contests some of the acts alleged to have occurred, communications that
5 were made, and the relationship between “Company 1” and Ignite. (See Dkt No. 78
6 at 18-22.)

7 7. Due to the delay in gaining access to the discovery, current defense counsel
8 has not had access to the discovery underlying these arguments, including
9 materials relevant to issues in the Motion to Dismiss. To the extent the Court
10 expects defense counsel to be able to discuss these materials at the currently
11 scheduled hearing on the Motion to Dismiss, defense counsel will be unable to do
12 so.

13 8. Therefore, the parties agree that to provide new counsel with sufficient time
14 to prepare for the hearing and afford the parties sufficient time to meet and confer,
15 the hearing on Defendants’ motion to dismiss should be continued until July 31,
16 2025, at 2:00 p.m.

17 9. Accordingly, the parties file this renewed request that the Court continue the
18 hearing date on Defendants’ motion to dismiss counts one through six of the
19 indictment to July 31, 2025, at 2:00 p.m.

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1 IT IS SO STIPULATED.

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3 DATED: June 1, 2025

Respectfully submitted,

4
5 /s/ Nina Marino
6 NINA MARINO
7 MORIAH RADIN
8 JENNIFER LIESER
9 KAPLAN MARINO, PC

10 Attorneys for Defendant
11 IGNITE INTERNATIONAL
12 BRANDS LTD.

13 /s/ David Schoen
14 DAVID SCHOEN
15 SIMON SCHOEN
16 SCHOEN LAW FIRM, LLC

17 Attorneys for Defendant
18 SCOTT ROHLER

19
20 DATED: June 1, 2025

21 BILAL A. ESSAYLI
22 United States Attorney
23 CHRISTINA T. SHAY
24 Assistant United States Attorney
25 Chief, Criminal Division

26 /s/ via email authorization
27 JASON C. PANG
28 ALEXANDER B. SCHWAB
MIKAELA W. GILBERT-LURIE
Assistant United States Attorney

Attorneys for Plaintiff
UNITED STATES OF AMERICA